

REMARKS

Reconsideration and allowance of the present patent application based on the foregoing amendments and following remarks are respectfully requested. Since this Amendment is being presented together with a Request for Continued Examination, entry of this Amendment is respectfully requested.

By this Amendment, claims 1, 10 and 11 are amended, claim 8 is cancelled without prejudice or disclaimer to the subject matter therein and claims 14-20 are newly added. Support for the amendments to claims 1, 10 and 11 and new claims 14-20 may be found throughout the specification. No new matter has been added. Accordingly, after entry of this Amendment, claims 1-7 and 9-20 will remain pending in the patent application.

Claims 1-11 were rejected under 35 U.S.C. 103(a) based on Van den Brink *et al.* (U.S. Patent No. 4,778,275), (hereinafter “Van den Brink”) in view of Shigeo (JP 6-302495), (hereinafter “Shigeo”). The rejection is respectfully traversed.

Claim 8 is cancelled without prejudice or disclaimer, thus rendering moot the rejection of this claim.

Claim 1 recites a method of positioning an object at a required position on an object table in a lithographic projection apparatus, comprising, *inter alia*, measuring a displacement between the first position of the object and a required position of the object on the first object table, and translating the object, the first object table, or both, relatively to each other by substantially the said displacement, in a direction substantially parallel to the plane of the table. Van den Brink does not disclose, teach or suggest these features.

Van den Brink discloses moving a mask and a substrate relative to each other during alignment of the mask relative to the substrate.

However, unlike claim 1, Van den Brink is silent as to re-setting an object on an object table at a different position. Specifically, Applicants respectfully submit that there is no teaching or suggestion anywhere in van den Brink, much less at col. 7, lines 24-40 of Van den Brink, as to measuring a displacement between the first position of the object and a required position of the object on the first object table, and translating the object, the first object table, or both, relatively to each other by substantially the said displacement. In Van den Brink, the mask (identified as the “object” of claim 1) and the substrate remain at the same position on their respective tables during the alignment procedure. These objects are, however, not translated relative to each other to a required position on their respective tables.

In other words, Van den Brink merely relates to moving an object set on its table (*i.e.*, moving the object and its table together), not re-setting an object on its table to a different position on the table.

Shigeo fails to remedy the deficiencies of van den Brink. Shigeo merely discloses removing the reticle 12 from the stage 11, rotating the stage 11, placing the reticle 12 back on the stage 11 and rotating the stage 11 in the reverse direction to return the reticle 12 to its original condition. Shigeo is completely silent as to translating the object, the first object table, or both, relatively to each other by substantially the said displacement, in a direction substantially parallel to the plane of the table; and placing the object at substantially the required position on the first object table. Therefore, any reasonable combination of van den Brink and Shigeo cannot result in any way in the invention of claim 1.

Claims 2-7 and 9-10 are patentable over Van den Brink, Shigeo and a combination thereof at least by virtue of their dependency from claim 1 and for the additional features recited therein.

Claim 11 is patentable over Van den Brink, Shigeo and a combination thereof for at least similar reasons as provided above with respect to claim 1, and for the additional features recited therein. Namely, claim 11 is patentable over Van den Brink, Shigeo and a combination thereof at least because this claim recites a method of positioning a substrate at a required position on a substrate table, said method comprising, *inter alia*, measuring a displacement between the first position of the substrate and a required position of the substrate on the substrate table and translating the substrate, the table, or both, relatively to each other by substantially the said displacement, in a direction substantially parallel to the plane of the table. For similar reasons provided above, any reasonable combination of Van den Brink and Shigeo cannot result in any way in the invention of claim 11.

Accordingly, reconsideration and withdrawal of the rejection of claims 1-11 under 35 U.S.C. 103(a) based on Van den Brink in view of Shigeo are respectfully requested.

Claims 14-20 are newly added and define additional subject matter that is novel and non-obvious over the cited references. Claims 14-20 are patentable over the cited references at least by virtue of their dependency from claims 1 or 11, respectively, and for the additional features recited therein. Accordingly, Applicants respectfully submit that claims 14-20 are in condition for allowance.

All rejections having been addressed, it is respectfully submitted that the present application is in a condition for allowance and a Notice to that effect is earnestly solicited.

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Respectfully submitted,

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